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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 3:07-md-05944-SC (N.D.
 Cal.)

MDL No. 1917

This Document Relates to: Individual Cases:
 No. 13-cv-2171 (SC)

Dell Inc., et al. v. Hitachi Ltd. et al., No. 13-
 cv-02171.

**DECLARATION OF DEBRA D.
 BERNSTEIN IN SUPPORT OF
 PLAINTIFFS' MOTION TO PARTIALLY
 EXCLUDE THE EXPERT REPORT AND
 OPINIONS OF JANUSZ A. ORDOVER,
 PH.D.**

1 I, **DEBRA D. BERNSTEIN**, declare as follows:

2 1. I am a Partner with the law firm of Alston & Bird LLP, counsel for Plaintiffs Dell Inc.
3 and Dell Products L.P. (collectively, “Dell”) in the above-captioned action currently pending in the
4 U.S. District Court for the Northern District of California. I submit this Declaration in support of
5 Plaintiffs’ Motion to Partially Exclude the Expert Report and Opinions of Janusz A. Ordovery, Ph.D.
6 (the “Ordovery Motion”).

7 2. I am a member in good standing of the State Bar of Georgia and am admitted to practice
8 before the U.S. District Court for the Northern District of Georgia. Pursuant to the Court’s Pretrial
9 Order No. 1 in the MDL Proceeding, I have been admitted *pro hac vice* in this litigation.

10 3. Attached hereto as **Exhibit A** is a true and correct copy of the April 15, 2014, Expert
11 Report of Mohan Rao (“Rao Report”).

12 4. Attached hereto as **Exhibit B** is a true and correct copy of the August 5, 2014, Expert
13 Report of Janusz A. Ordovery, Ph.D.

14 5. Attached hereto as **Exhibit C** are true and correct copies of portions of the Transcript of
15 the September 16-17, 2014, Deposition of Dennis Carlton, Ph.D.

16 6. Attached hereto as **Exhibit D** are true and correct copies of portions of the Transcript of
17 the September 4-5, 2014, Deposition of Janusz A. Ordovery, Ph.D.

18 7. Attached hereto as **Exhibit E** are true and correct copies of portions of the Transcript of
19 the June 2, 2014, Deposition of Julie French as Dell Inc.’s and Dell Products L.P.’s Rule 30(b)(6)
20 Witness.

21 8. Attached hereto as **Exhibit F** is a true and correct copy of the Objections and Responses
22 by Plaintiffs Dell, Inc. and Dell Products, L.P. to Samsung SDI Mexico De C.V.’s First Set of
23 Interrogatories.

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25 [CONTINUED ON FOLLOWING PAGE]
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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

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4 Executed on December 5, 2014, in Atlanta, Georgia.

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6 /s/ Debra D. Bernstein

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EXHIBIT A

[Filed Under Seal]

EXHIBIT B

[Filed Under Seal]

EXHIBIT C

[Filed Under Seal]

EXHIBIT D

[Filed Under Seal]

EXHIBIT E

[Filed Under Seal]

EXHIBIT F

[Filed Under Seal]